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April 27, 2009

VIA ELECTRONIC CASE FILING

Hon. Carol Bagley Amon
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Civil Action No.: 07-2433 (CBA)(RER)
Anand Dasrath v. Ross University School of Medicine

Dear Judge Amon:

This firm represents the defendant Ross University School of Medicine ("Ross University"). I write to address the motion filed by which plaintiff's counsel seeks to be relieved. Ross University takes no position on the ultimate relief sought by counsel. However, Ross University writes to address the most recent request outlined in counsel's letter to Your Honor dated April 21, 2009 wherein he suggests that the Court extend Plaintiff's time to file and serve an amended complaint for an additional 90 days, or until July 31, 2009. For reasons unique to this matter, Ross University objects to this portion of counsel's application and respectfully requests that Your Honor's original order, requiring plaintiff to file an amended complaint, if he should so choose, on or before April 30, 2009, remain in tact. The tortured history of this case spawns the defendant's request.

Mr. Dasrath commenced an action in the Supreme Court of New York, Queens County, in or about August 2006 alleging breach of contract based on the same set of facts that form the basis of this action. During those proceedings Mr. Dasrath's first lawyer was replaced by a second lawyer who, after various adjournments and delays, finally responded to Ross University's motion to dismiss. The case was dismissed on jurisdictional grounds. A third lawyer representing Mr. Dasrath filed a notice of appeal but failed to perfect the same despite this office's appearances at conferences with the state appellate court.

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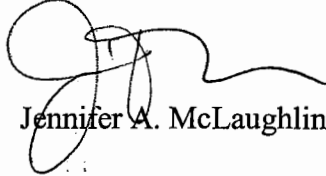
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Mr. Dasrath then retained a fourth lawyer, Mr. Zelenitz and this federal action ensued in or about June, 2007. Ross University immediately sought and was granted by Your Honor permission to file a motion to dismiss. Plaintiff's response to that motion languished due to a series of fruitless settlement demands and Mr. Zelenitz's ultimately successful application to be removed as counsel. Now we are met with an application by Mr. Dasrath's fifth lawyer to be removed as counsel and to effectively extend plaintiff's ability to further protract this litigation. Under the circumstances outlined above Ross University strenuously objects. It has invested an inordinate amount of time and expense as a result of the various attorneys handling the matter on behalf of Mr. Dasrath. As such, if Mr. Dasrath is inclined to pursue the litigation further, the original timeframe suggested by Your Honor, namely on or before April 30, 2009, should be enforced.

Very truly yours,

A handwritten signature in black ink, appearing to be "JM", with a long horizontal flourish extending to the right.

Jennifer A. McLaughlin (JM 5678)

JAM:gl

cc: Albert Adam Breud, II